

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Margaritaville Enterprises, LLC, a
Delaware Limited Liability Company,

Plaintiff,

v.

Sonzea Trading Co., Limited, Suzhou
Ruoxing Network Technology Co., Ltd.,
Jiangxi Dengshou Network Technology
Co., Ltd., Shenzhen Jiayi E-Commerce Co.,
Ltd., Reyoe Technology Co., Ltd., Zero-
Miracle Network Limited, and the
Individual and Entity associated with the
domain <newevers.com>

Defendants.

Case No. 1:23-cv-08189

Honorable Thomas M. Durkin

Magistrate Judge David Weisman

JURY TRIAL DEMANDED

**PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT
AGAINST THE INDIVIDUAL AND ENTITY ASSOCIATED WITH THE DOMAIN
<NEWEVERS.COM>**

Plaintiff Margaritaville Enterprises, LLC (“Plaintiff” or “Margaritaville”), by and through its undersigned counsel and pursuant to Rule 55(a) and Rule 55(b) of the Federal Rules of Civil Procedure, hereby moves the Court for entry of default and entry of default judgment against the Individual and Entity associated with the domain <newevers.com> (“Defendant Newevers”), for their failure to plead or otherwise defend this action. In support of its Motion, Margaritaville relies upon authority and facts set forth in the accompanying Memorandum of Law and Declaration of Molly Carr (Exhibit 1).

WHEREFORE, Margaritaville requests that the Court (i) enter default and default judgment against Defendant Newevers; (ii) award statutory damages in the amount of \$3,000,000 (\$1,000,000 per counterfeit mark) pursuant to 15 U.S.C. 1117(c); and (iii) enter a permanent

injunction prohibiting Defendant Newevers from using the JIMMY BUFFET Marks, or any reproduction, counterfeit, copy, or colorable imitation of said marks, in a matter likely to cause others to believe that Defendant Newevers is associated with, sponsored by, or endorsed by Margaritaville.

DATED: August 19, 2025

Respectfully submitted,

By: /s/ Jacqueline Brousseau
Cameron M. Nelson
Barry R. Horwitz
Jacqueline Brousseau
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*Counsel for Plaintiff Margaritaville
Enterprises, LLC*

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on August 19, 2025, the foregoing was served upon counsel of record via the Court's ECF system.

DATED: August 19, 2025

GREENBERG TRAURIG, LLP

By: /s/ Jacqueline Brousseau _____

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